IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA READING DIVISION

IN RE: ADAM SCHIAFFO CHAPTER 13

BKY NO. 15-17316-AMC Debtor

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING

Lynn E. Feldman, Esquire has filed a Second Motion to Modify Plan After Confirmation.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- If you do not want the Court to grant the Second Motion to Modify 1. Plan After Confirmation or of you want the Court to consider your views on the Motion, then on or before November 6, 2019 your attorney must do all of the following:
 - (a) File an answer explaining your position at:

United States Bankruptcy Court Suite 300, The Madison Building **400 Washington Street** Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) Mail a copy to the Movant's Attorney:

Lynn E. Feldman, Esquire Feldman Law Offices, P.C. 221 N. Cedar Crest Blvd. Allentown, PA 18104 Telephone No.: (610) 530-9285

Facsimile No.: (610) 437-7011

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the Motion.
- 3. A hearing on the Motion is scheduled to be held before the Honorable Ashely M. Chan on Thursday, November 14, 2019 at 11:00 a.m. in Courtroom 1, United States Bankruptcy Court, Suite 300, The Madison Building, 400 Washington Street, Reading, PA 19601. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).
- 4. If a copy of their motion is not enclosed, a copy of one will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the Hearing has been canceled because no one filed an answer.

Date: October 16, 2019

/s/ Lynn E. Feldman, Esquire LYNN E. FELDMAN, ESQUIRE Attorney for Debtors PA I.D. No. 35996 221 N. Cedar Crest Blvd. Allentown, PA 18104 (610) 530-9285